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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

JAN 4 4 26 PM '02

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF POSTAL SERVICE WITNESS COCHRANE TO UPS INTERROGATORIES (UPS/USPS-T40-2-4)

The United States Postal Service hereby moves for late acceptance of the response of Postal Service witness Cochrane to the following interrogatories of United Parcel Service: UPS/USPS-T40-2-4, filed on December 11, 2001. These responses were delayed due to the unavailability of key personnel during the recent holiday season. The Postal Service believes that no party will be prejudiced by the short delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 January 4, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 January 4, 2002